



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY, REGION I

5 Post Office Square, Suite 100
Boston, MA 02109-3912

5 April 2016

LTC Scott Zuffanti
Base Operations Manager
Camp Edwards
Department of the Army
Massachusetts Army National Guard Training Site
Camp Edwards, MA 02542-5003

RE: Training Range and Impact Area, Massachusetts Military Reservation. EPA Docket No. SDWA I-97-1030, Proposed Limited Authorization for Percussion Activated Neutralizer (PAN) Training

Dear LTC Zuffanti:

In a letter dated 18 August 2015, the Massachusetts National Guard (MANG) requested the United States Environmental Protection Agency (EPA) to modify the Scope of Work (SOW) to Administrative Order SDWA I-97-1030 (AO2) issued pursuant to Section 1431(a) of the Safe Drinking Water Act with respect to the Joint Base Cape Cod (JBCC). Specifically, the MANG requested approval to use the Percussion Activated Neutralizer (PAN) training device at the Cantonment Area between East Outer Road and East Truck Road adjacent to the EOD building, at the Cantonment Area at MOUT Site Calero, and at the Soldier Validation Lane in the Camp Edwards Training Area.

Based on EPA's review of the information submitted by MANG (see EPA Findings below), EPA is proposing to modify AO 2. Therefore, this letter constitutes:

1. EPA's proposed agreement to modify AO2 (see Proposed Modification below); and
2. EPA's announcement of a 30-day public comment period regarding the Proposed Modification (see Public Comment Procedure).

(Note that EPA, on 22 December 2015, submitted a separate proposed agreement to modify AO2, Scope of Work, Section II.A.1.e. However, that December 22, 2015 letter included inaccurate provisions regarding the AO2 subsection proposed to be modified, and the number of times the PAN was to be used. By this letter, EPA considers the December 22, 2015 proposed agreement to be superseded by the Proposed Modification described herein.)

Background:

In its efforts to protect the sole source Cape Cod Aquifer, EPA has issued four administrative orders at JBCC, three pursuant to the Safe Drinking Water Act. The second Administrative Order, known as AO2, was issued in May 1997. Among other provisions, AO2 includes the suspension of particular military training activities at the Training Range and Impact Area of JBCC (AO2, Scope of Work, Section II.A.). Among the activities suspended were "[a]ll use of pyrotechnics at or near the Training Range and Impact Area", (AO2, Scope of Work, Section II.A.1.f).

AO2 also includes provision for modifying Scope of Work requirements based on specified demonstrations (Paragraph 125). If a Respondent to AO2 believes that a modification to the work specified pursuant to AO2 is necessary and appropriate, the Respondent may petition EPA for a determination on the potential modification. Included among the bases for such a modification is "documentation demonstrating that the use of a pyrotechnic... that is suspended pursuant to this Order does not present a threat of harm to the public or the environment that would warrant its continued suspension under this Order."

18 August 2015 MANG Petition for Modification:

As described above, the MANG petition requested a modification to allow use of the PAN for training purposes. According to the petition, this PAN would constitute use of a pyrotechnic training tool.

EPA Findings:

Per the information submitted with the 18 August 2015 petition, use of the PAN on JBCC, the PAN may contain the following constituents:

	Weight
Low Velocity Blank:	
Propellant	20 grams
Copper	
Zinc	
Nickel	
Antimony Sulfide	
Barium	
Lead, dihydroxy[2,4,6-trinitro-1,3-benzenediolato(2-)]di-	
Aluminum	
Nitrocellulose	
Nitroglycerin	
1-Tetrazene-1-carboximidic acid, 4-(aminoiminomethyl)-, 2-nitrosohydrazide	
Primer Perc	NL
Copper	
Zinc	
Nickel	
Antimony Sulfide	
Barium	

Lead, dihydroxy[2,4,6-trinitro-1,3-benzenediolato(2-)]di-
Aluminum
Nitrocellulose
Nitroglycerin
1-Tetrazene-1-carboximidic acid, 4-(aminoiminomethyl)-
, 2-nitrosohydrazide

Enhanced Blank:

Smokeless Powder

90 grams

Calcium carbonate
Dibutylphthalate
Dinitrotoluene
Diphenylamine
Ethyl centralite
Graphite
Nitrocellulose
Nitroglycerin
Potassium nitrate
Potassium sulfate
Sodium sulfate

Smokeless Powder

20 grams

Nitroglycerin
Rosin
Unknown

Primer Perc

NL

Copper
Zinc
Nickel
Antimony Sulfide
Barium
Lead, dihydroxy[2,4,6-trinitro-1,3-benzenediolato(2-)]di-
Aluminum
Nitrocellulose
Nitroglycerin
1-Tetrazene-1-carboximidic acid, 4-(aminoiminomethyl)-, 2-nitrosohydrazide

Shotgun:

Black Powder

Primer

NL

Copper
Zinc
Dibutyl phthalate
Potassium nitrate
Charcoal
Nitrocellulose
Nitroglycerin
Sulfur
Polyethylene

Iron	
Normal lead styphnate	
Primer mix	NL
Copper	
Zinc	
Nickel	
Antimony Sulfide	
Barium	
Lead, dihydroxy[2,4,6-trinitro-1,3-benzenediolato(2-)]di-	
Aluminum	
Nitrocellulose	
Nitroglycerin	
1-Tetrazene-1-carboximidic acid, 4-(aminoiminomethyl)-, 2-nitrosohydrazide	
.50 Cal Blank	
Propellant Charge	162 grams
Nitrocellulose	
Potassium nitrate	
Nitroglycerin	
Charcoal	
Sulfur	
Diphenylamine	
Potassium sulfate	
Ethyl centralite	
Graphite	
Ethyl alcohol	
Pyrotechnic Lead ("Shock Tube")	
HMX/Aluminum Powder	
HMX	0.0728 grams
Aluminum powder	0.0072 grams

NL – Not Listed

MANG has indicated that MANG and out-of-state soldiers are forecasted to use up to 180 to 250 shots per year. EPA finds that given the amount of contaminants contained in the PAN, the number of shots to be employed by the units in a given year, and the size of the areas where the PAN will be used, EPA does not expect that the use of these items in the manner proposed will present a threat to the sole source aquifer.

Proposed Modification:

Based on the above discussion and findings, EPA submits for public comment a proposal to modify AO2 as specified below: EPA hereby proposes to modify AO2, Section II.A.1.f, Response Activities, to allow use of one type of training device, the PAN, in limited quantities at the Cantonment Area between East Outer Road and East Truck Road adjacent to the EOD building, at the Cantonment Area at MOUT Site Calero, and at the Soldier Validation Lane in the Camp Edwards Training Area. The specific modification proposed at this time by EPA is to modify AO2,

Scope of Work, Section II.A.1.f. The proposed paragraph provides as follows, with underlining to denote the new language:

1. ... Respondents shall suspend the following activities:

...

f. All use of pyrotechnics at or near the Training Range and Impact Area, provided however, that the use of the Percussion Activated Neutralizer, in quantities no greater than 250 per year, shall not be prohibited in the Cantonment Area between East Outer Road and East Truck Road adjacent to the EOD building, in the Cantonment Area at MOUT Site Calero, and in the Soldier Validation Lane at Camp Edwards.

i. The authorization is conditioned upon compliance with all conditions established by the Environmental Management Commission.

ii. The authorization does not extend to any other training device.

If this proposed modification is made effective, it would not modify any other provision of the AOs.

Public Comment Procedure:

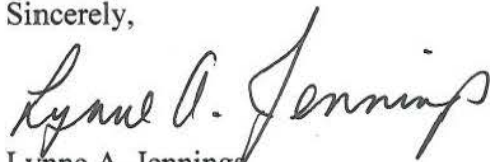
EPA is accepting public comments on this proposal until 6 May 2016. All public comments must be submitted in writing, and may be sent to:

Lynne Jennings
EPA
5 Post Office Square – Suite 100
Mail Code OSRR07-03
Boston, MA 02109-3912

At the close of the public comment period, EPA will review public comments, make any appropriate changes and issue its final decision.

If you have any questions about the terms of this proposed modification, please contact me at (617) 918-1210.

Sincerely,



Lynne A. Jennings
Section Chief
Federal Facilities Superfund Section

cc: L. Pinaud/MassDEP
M. Ciaranca/E&RC
B. Gregson/IAGWSP
T. Conway
J. Dolan